

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA

V.

A black and white photograph showing a dark, textured surface, likely a book cover or endpaper, with a vertical strip of lighter material along the right edge.

TERRENCE KEITH BARROW (5)

§ **SEALED**

No. 4:20CR 141
Judge Jordan

FILED

JUN 11 2020

**CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

INDICTMENT

THE UNITED STATES GRAND JURY CHARGES:

Count One

Violation: 18 U.S.C. §§ 1951, and 2
(Conspiracy to Interfere with Interstate
Commerce by Robbery, Aiding and
Abetting)

THE CONSPIRACY

From on or about May 1, 2020, and continuing through on or about June 11, 2020,
in the Eastern District of Texas and elsewhere.

Terrence Keith Barrow

the defendants, did knowingly, intentionally and unlawfully combine, conspire, confederate, and agree together and with each other, and with others known and unknown

to the Grand Jury, to commit a certain offense against the United States, to wit: to obstruct, delay, affect or interfere with commerce by robbery or threats of physical violence to person(s) in furtherance of a plan to obstruct, delay or affect commerce, in violation of 18 U.S.C. §§1951 and 2.

OBJECT OF THE CONSPIRACY

The object of the conspiracy was to unlawfully take and obtain personal property, primarily consisting that of United States currency, from the persons and in the presence of employees, owners, and agents of businesses against their will by means of actual and threatened force, violence, and fear of immediate injury to their persons and property.

MANNER AND MEANS

It was part of the conspiracy that, [REDACTED]

[REDACTED]

[REDACTED] **Terrence Keith Barrow**, the defendants, and other persons known and unknown to the Grand Jury, discussed and planned with each other, among other things, a robbery that occurred at or near the residence of a business owner on or about May 4, 2020, in Frisco, Texas, that resulted in the loss of personal property in the approximate amount of \$16,000.

At all times during the course and scope of the conspiracy, the above-mentioned businesses conducted business in interstate commerce, and the conspiracy would have, and did, in any way or degree, obstruct, delay, and affect, and attempt to obstruct, delay, and affect, commerce as contemplated by 18 U.S.C. §1951.

1. It was further part of the conspiracy that the defendants and others known and unknown to the Grand Jury formulated a plan and agreement, which, among other things, included:
 - a. the acquisition of United States currency and other property;
 - b. the identification and surveillance of victims in preparation of the robbery;
 - c. the acquisition of property for use in committing robbery;
 - d. the timing and means of transportation to commit robbery;
 - e. the roles of participation during the preparation for and commission of robbery;
 - f. plans to avoid detection and apprehension by law enforcement.

OVERT ACTS OF THE CONSPIRACY

To effect the object of the conspiracy, [REDACTED]

[REDACTED] **Terrence Keith Barrow**, the defendants, and other persons known and unknown to the Grand Jury, committed overt acts within the Eastern District of Texas, and elsewhere, including, but not limited to, the following:

On or about May 4, 2019, in Frisco, Texas, a location within the Eastern District of Texas, [REDACTED]

[REDACTED] **Terrence Keith Barrow**, and other persons known and unknown to the Grand Jury, aided and abetted

each other, took personal property, to include (amounts are estimates), one Gold Ring with place settings for five diamonds and multiple smaller stones valued at \$500, one Yellow Gold Ring with initials “CCE” engraved valued at \$500, 300-500 loose diamonds valued at \$3,000, one two tone stainless Rolex watch valued at \$9,000, an iPhone 8 with black case valued at \$800, a brown leather backpack valued at \$200, assorted cash denominations in the approximate amount of \$2,000, miscellaneous credit/debit cards, and a Texas driver's license, from the person against their will, by means of actual or threatened force, violence, and fear of injury to their person.

All in violation of 18 U.S.C. §§1951 and 2.

Count Two

Violation: 18 U.S.C. § 924(c)(1)(A)
(Possession of a firearm in furtherance of
a crime)

On or about May 4, 2020, within the Eastern District of Texas, [REDACTED]

[REDACTED] Terrence Keith Barrow, defendants,
did knowingly possess a firearm, in furtherance of a crime of violence for which he may
be prosecuted in a Court of the United States, to wit: conspiracy to interfere with
interstate commerce by robbery, aiding and abetting.

In violation of 18 U.S.C. § 924(c).

NOTICE OF INTENTION TO SEEK CRIMINAL FORFEITURE

As a result of committing the offense charged in this Indictment, the defendants shall forfeit to the United States, pursuant to 18 U.S.C. § 924(d) and 28 U.S.C. § 2461, all property used to commit or facilitate the offenses, proceeds from the offenses, and property derived from proceeds obtained directly or indirectly from the offenses, including but not limited to the following:

1. One semi-automatic handgun, manufacturer Beretta, caliber .40, bearing serial number 037125MC;
2. One revolver handgun, manufacturer Smith and Wesson, caliber .357, bearing serial number CFC3254;
3. One rifle, Century Arms RAS47, caliber 7.62 X 39mm long rifle, bearing serial number RAS47093881;
4. United States currency in the amount of \$760.00 seized from the person of [REDACTED];

All such proceeds and/or instrumentalities are subject to forfeiture by the government.

A TRUE BILL



GRAND JURY FOREPERSON

STEPHEN J. COX
UNITED STATES ATTORNEY

ERNEST GONZALEZ
Assistant United States Attorney

6/11/20
Date

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NOTICE OF PENALTY

Count One

Violation: 18 U.S.C. §§1951 and 2

Penalty: Imprisonment for a term of not more than twenty years; a fine not to exceed \$250,000.00; and supervised release of not more than three years.

Special Assessment: \$100.00

Count Two

Violation: 18 U.S.C. § 924(c)(1)(A)

Penalty: Imprisonment for not less than five years to be served consecutive with any other term; if the firearm is brandished, imprisonment for not less than seven years; if the firearm is discharged, imprisonment for not less than ten years; a fine not to exceed \$250,000, or both; a term of supervised release of not more than five years.

Special Assessment: \$100.00